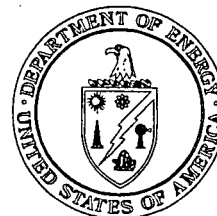




Department of Energy

Ohio Field Office
Fernald Closure Project
175 Tri-County Parkway
Springdale, Ohio 45246
(513) 648-3155



DEC 1 2004

Mr. James A. Saric, Remedial Project Manager
United States Environmental Protection Agency
Region V, SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0073-05

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF CHANGE PAGES TO THE FINAL CERTIFICATION DESIGN
LETTER FOR AREA 9, PHASE III ABANDONED OUTFALL LINE – PART TWO**

- References: 1) OEPA Letter, T. Schneider to W. Taylor, "Disapproval – CDL and PSP for Certification Sampling for A9PIII AOL – Part 2," dated November 23, 2004
- 2) Email, F. Miller to T. Schneider and J. Saric, "Area 9, Phase III – MH-180A," dated October 11, 2004
- 3) "Variance/Field Change Notice (V/FCN) 21140-PSP-0003-04 to Project Specific Plan (PSP) for Certification Sampling in Area 9, Phase III Abandoned Outfall Line – Part One," submitted October 11, 2004
- 4) OEPA Approval Letter, D. Bohannon to J. Chiou, "V/FCN 21140-PSP-0003-04 Project Specific Plan for Area 9, Phase III Certification Sampling Abandoned Outfall Line – Part One," dated October 13, 2004

Enclosed for your review and approval are change pages to the final Certification Design Letter (CDL) for Area 9, Phase III (A9PIII) Abandoned Outfall Line – Part Two. These change pages are in response to Ohio Environmental Protection Agency's (OEPA) request, as noted in Reference 1 above, to remove the language related to the free release of the remaining sheet piles surrounding the abandoned outfall line at the riverbank from the CDL. Justifications for leaving the remaining sheet piles will be incorporated into the certification report for your review and approval following your approval of this CDL.

Mr. James A. Saric
Mr. Tom Schneider

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DOE-0073-04

Additionally, the document was disapproved based on text changes between the draft Revision A, which contains the approach to analyze only a portion of the Area-Specific Constituent of Concern (ASCOC) list as indicator constituents and if detected, to analyze the remainder of the list, and the final Revision 0, which directs the analysis of the entire *modified* ASCOC list in all cases. Since technetium-99, one of the indicator ASCOCs, was detected in a few of the A9PIII – Part One Certification Units (CU), the decision was made to analyze the entire *modified* ASCOC list in all cases as a conservative approach to assure that all ASCOCs were analyzed and reported with the best quality assurance. This minimized the instances where constituents with short holding times exceeded those holding times while waiting for the indicator constituents to be reported and assessed. This conservative approach was taken with the expectation that one or more samples in every CU would have a detection of one of the indicator ASCOCs, and therefore eliminated the need for the text related to the 'if/then' statement and the use of indicator ASCOCs.


The modification to the A9PIII ASCOC list, as reflected in Table 3-1 of the final CDL, was determined necessary during the certification of the Manhole 180A area in A9PIII – Part One. This change was not explained in a formal transmittal or the cover letter of the final CDL. However, the changes were described in detail in an email to both the U.S. Environmental Protection Agency (EPA) and OEPA dated October 11, 2004 (Reference 2). This email in its entirety is also enclosed.

As the email indicated, a significant variance was submitted (Reference 3) and subsequently approved (Reference 4) to document the modifications to the ASCOC list. Also, as stated in the email, the previously approved CDL and PSP for A9PIII – Part Two were revised to Revision 0 that incorporated the changes to the ASCOC list. All three parts of A9PIII will be certified for this ASCOC list.

Other than the change pages noted above regarding the sheet piles, no further changes to the CDL are necessary in response to the disapproval letter.

If you have any questions or require additional information, please contact Johnny Reising at (513) 648-3139.

Sincerely,


William J. Taylor
Director

FCP:Reising

Enclosures: As Stated

Mr. James A. Saric
Mr. Tom Schneider

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DOE-0073-05

cc w/enclosures:

D. Pfister, OH/FCP
J. Reising, OH/FCP
T. Schneider, OEPA-Dayton (three copies of enclosures)
G. Jablonowski, USEPA-V, SR-6J
F. Bell, ATSDR
M. Cullerton, Tetra Tech
M. Shupe, HSI GeoTrans
R. Vandegrift, ODH
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosures:

R. Abitz, Fluor Fernald, Inc./MS64
K. Alkema, Fluor Fernald, Inc./MS01
L. Barlow, Fluor Fernald, Inc./MS52-3
J. Chiou, Fluor Fernald, Inc./MS64
M. Frank, Fluor Fernald, Inc./MS64
F. Johnston, Fluor Fernald, Inc./MS52-5
U. Kumthekar, Fluor Fernald, Inc./MS64
S. Lorenz, Fluor Fernald, Inc./MS52-3
E. Lupton, Fluor Fernald, Inc./MS64
J. McCormack, Fluor Fernald, Inc./MS17
F. Miller, Fluor Fernald, Inc./MS64
C. Murphy, Fluor Fernald, Inc./MS01
D. Nixon, Fluor Fernald, Inc./MS01
D. Powell, Fluor Fernald, Inc./MS64
T. Snider, Fluor Fernald, Inc./MS64
B. Zebick, Fluor Fernald, Inc./MS60
ECDC, Fluor Fernald, Inc./MS52-7